

**IN THE UNITED STATES BANKRUPTCY CMYT
FOR THE ISTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Case No. 19-24636-GLT
)	
Jerome D. Boyd)	Chapter 13
Debtor)	
)	Doc. No.:
Jerome D. Boyd)	
Movant)	
)	
v.)	
)	
Ronda J. Winnecur, Trustee)	
Respondent)	

**NOTICE OF CONVERSION FROM CHAPTER 13 TO CHAPTER 7
FILED PURSUANT TO FED. RULE BANKR. PROC. 1017(f)(3)**

AND NOW COMES, the Debtor, by and through attorney, Albert G. Reese, Jr. and the Law Office of Albert G. Reese, Jr., and files the within Notice of Conversion from Chapter 13 to Chapter 7 pursuant to Federal Rule of Bankruptcy Procedure 1017(f)(3) for the following reasons:

Debtor filed the instant case to save his home. The Debtor has made his best efforts to fund the current Chapter 13 Plan. The Debtor has experienced several substantial financial expenditures during his current Chapter 13 Bankruptcy case which unfortunately will prevent him from timely completing the pending case. As a result, it would be a financial hardship for the Debtor to continue to fund his pending Chapter 13 Case. In addition, the Debtor desires to convert his case to one under Chapter 7 and receive a fresh start. Debtor plans to refile another Chapter 13 Case to save his home as he is only approximately \$10,500.00 from completing the current case.

Date: January 27, 2025

Respectfully submitted by:
/s/ Albert G. Reese, Jr., Esquire
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